

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

AKARI JOHNSON and
HAZEL THOMPSON,

Plaintiffs,

CASE NO.: 4:24-cv-10017-JEM

v.

MMI 82, LLC,
and THE ENTHUSIAST LLC,

Defendants.

PLAINTIFFS' STATEMENT OF CLAIM

Plaintiffs, AKARI JOHNSON ("Plaintiff Johnson") and HAZEL THOMPSON ("Plaintiff Thompson"), pursuant to the Court's Order entered on May 31, 2024 [D.E. 12], file this Statement of Claim based on the information known to them and estimate as follows:

PRELIMINARY STATEMENT

This Statement of Claim is not to be construed as a demand, nor as an exact quantification of damages, but merely as a case management tool required by the Court. *See Calderon v. Baker Concrete Const., Inc.*, 771 F.3d 807, 811 (11th Cir. 2014) ("That document is an extra-Rules practice used by the district court for its convenience and to aid in case management. It does not have the status of a pleading and it is not an amendment under Rule 15 of the Federal Rules of Civil Procedure.")

INFORMATION REQUESTED BY THE COURT

Plaintiffs do not have all the time, pay, or compensation records relative to their employment at this time. As such, they must estimate the corresponding overtime wages owed to them. Plaintiffs reserve the right to amend this Statement of Claim based upon additional

information provided by Defendants, through discovery, and/or as additional or different information becomes known.

I. Unpaid Wages (Estimate)

- a. **Akari Johnson** – Plaintiff Johnson is owed an estimate of **\$9,558.00** in unpaid wages.
- b. **Hazel Thompson** – Plaintiff Thompson is owed an estimate of **\$20,100.00** in unpaid wages.

II. Calculation of Unpaid Wages

a. **Akari Johnson**

Defendant employed Plaintiff Johnson from June 2023 through December 2023, approximately 29.5 weeks, at a rate of \$18.00 per hour. Plaintiff Johnson worked approximately 12 hours of overtime each week throughout his employment, and Defendant failed to compensate Plaintiff Johnson for any overtime wages. Plaintiff Johnson calculates his owed wages as follows:

$$\begin{aligned} &18 (\$/\text{hr}) \times 1.5 (\text{overtime rate}) \times 12 (\text{overtime hours per week}) \\ &\quad \times 29.5 (\text{weeks of employment}) = \mathbf{\$9,558.00} \end{aligned}$$

b. **Hazel Thompson**

Defendant employed Plaintiff Thompson from May 2023 through December 2023, approximately 33.5 weeks, at a rate of \$20.00 per hour. Plaintiff Thompson worked approximately 20 hours of overtime each week throughout her employment, and Defendant failed to compensate Plaintiff Thompson for any overtime wages. Plaintiff Thompson calculates her owed wages as follows:

$$\begin{aligned} &20 (\$/\text{hr}) \times 1.5 (\text{overtime rate}) \times 20 (\text{overtime hours per week}) \\ &\quad \times 33.5 (\text{weeks of employment}) = \mathbf{\$20,100.00} \end{aligned}$$

III. Nature of the Unpaid Wages

- a. **Akari Johnson** – Overtime Wages
- b. **Hazel Thompson** – Overtime Wages

Respectfully submitted on this 11th day of June, 2024.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on June 11, 2024, on all counsel of record on the service list below via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Daniel J. Barroukh
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